
**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	
)	
Steven David Jaros and June Marie Jaros)	NO. 15-35330
)	
)	CHAPTER 13
Debtor)	
)	
)	HON. Bruce W. Black
)	

NOTICE OF HEARING

TO: Glenn Stearns, Chapter 13 Trustee (electronically via ECF)
Internal Revenue Service, P.O. Box 7346, Philadelphia, PA 19101 (via US Mail)
Internal Revenue Service, Mail Stop CH1 230 S. Dearborn, Chicago, IL 60604 (via U.S. Mail)
Attorney General of the United States Tax Division (DOJ) , PO Box 55 Ben Franklin Station, Washington, DC 20530 (via U.S. Mail)
Civil Process Clerk, Office of the United States Attorney for the Northern District of Illinois, 219 S. Dearborn, 5th Floor, Chicago, IL 60604 (via U.S. Mail)
Internal Revenue Service, Attn: A.E. Munoz, 230 S. Dearborn, Room 2600, M/S 5014CHI, Chicago, IL 60604
Steven and June Jaros, 922 Homestead Drive, Yorkville, IL 60560

PLEASE TAKE NOTICE that on March 18, 2016 at 10:00 a.m., the undersigned will appear before the Honorable Judge Bruce W. Black at Joliet City Hall, 150 West Jefferson Street, 2nd Floor, Joliet, IL 60432 and will then and there present the attached **DEBTOR'S OBJECTION TO CLAIM 1-2 OF THE INTERNAL REVENUE SERVICE**, at which time you may appear if you so choose.

Certificate of Service

I, Penelope N. Bach, hereby certify that I caused a copy of this notice to be served, electronically via ECF to Glenn Stearns (Chapter 13 Trustee), and via U.S. Mail to the Internal Revenue Service at the locations listed above, and attached Objection upon the above parties on February 11, 2016 before the hour of 5:00 p.m. from the office located at 900 Jorie Blvd., Ste 150, Oak Brook, IL 60523.

BY: /S/ PENELOPE N. BACH
SULAIMAN LAW GROUP, LTD.
COUNSEL FOR DEBTOR(S)
900 JORIE BOULEVARD, SUITE 150
OAK BROOK, IL 60523
PHONE: (630) 575-8181
FAX: (630) 575-8188
ATTORNEY NO: 6284659

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NOW COMES Steven David Jaros and June Marie Jaros (“Debtors”), by and through their attorneys, Sulaiman Law Group, Ltd, and pursuant to Federal Bankruptcy Procedure Rule 3007, Objecting to Claim 1-2 filed by the Department of the Treasury - Internal Revenue Service (“IRS”) on November 24, 2015, and in support thereof stating as follows:

1. The instant bankruptcy proceeding was filed under Chapter 13 of the Bankruptcy Code on October 16, 2015.
2. The 341 Meeting of Creditors was held and concluded.
3. On or about November 24, 2015, the IRS filed an amended proof of claim in the amount of \$232,233.17. *See* attached Exhibit is a true and accurate copy of the Proof of Claim (“Claim 1-2”) filed by the IRS.
4. On or about January 10, 2015, the Debtors filed for relief under Chapter 7 of the United States Bankruptcy Code case number 15-00698.
5. The Debtors’ received a Discharge in their Chapter 7 case on August 5, 2015.
6. As a direct result of Debtors’ Chapter 7 Discharge, the general unsecured portion of the Internal Revenue Services’ claim should be zero as each of these tax years was discharged per 11 USC 523(a)(1) and 11 USC 507(a)(8).

7. The Debtors tax liability to the IRS should be significantly less than what is shown on proof of claim 1- 2, therefore the claim should be lowered by the discharged unsecured amount of \$226,284.17.

8. The remaining balance due the IRS should be \$8,949.00.

WHEREFORE, the Debtors pray this Honorable Court for the following relief:

- A. Sustaining Debtors' Objection to Claim 1-1;
- B. Reducing the IRS's claim in Claim 1-1 by \$226,284.17 to reflect a total claim amount of \$8,949.00;
- C. For any and all other relief this Court deems fair and proper.

Dated: February 11, 2016

Respectfully Submitted,

/s/ Penelope N. Bach
Penelope N. Bach #6284659
Sulaiman Law Group, Ltd.
900 Jorie Blvd, Ste 150
Oak Brook, IL 60523
Phone: (630) 575-8181

Exhibit A